



February 13, 2019

VIA WEB PORTAL

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington DC 20554

**RE: Annual CPNI Certification of SageNet LLC – EB Docket No. 06-36**

Dear Ms. Dortch,

SageNet LLC, pursuant to 47 C.F.R. § 64.2009(e), submits the attached annual CPNI compliance certification together with an accompanying Statement of SageNet LLC explaining CPNI Procedures.

Should you have any questions or require further information, please do not hesitate to contact the undersigned at (703) 848-1468.

Very truly yours,  
SageNet LLC

Andrew Ruiz de Gamboa  
VP, General Counsel & Corporate Secretary

Attachment(s)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering calendar year 2018

Date filed: February 13, 2018

Name of company covered by this certification: SageNet LLC

Form 499 Filer ID: 802375

Name of signatory: Andrew Ruiz de Gamboa

Title of signatory: VP, General Counsel and Corporate Secretary

I, Andrew Ruiz de Gamboa, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: \_\_\_\_\_



Andrew Ruiz de Gamboa  
VP, General Counsel & Corporate Secretary

Attachment: Statement of SageNet LLC, Explaining CPNI Procedures

## **Statement of SageNet LLC Explaining CPNI Procedures**

### **Annual 47 C.F.R. § 64.2009(c) CPNI Certification**

1. SageNet provides certain customers with broadband satellite service and telecommunications and/or voice over Internet protocol ("VoIP") service. All of SageNet's customers are businesses or governmental agencies.
2. It is the policy of SageNet not to use, disclose or permit access to Customer Proprietary Network Information ("CPNI") without prior customer notification for any purpose other than the following: to provide customers with the purchased services; billing and collection for purchased services; to customize purchased services; to perform maintenance and diagnostics; to provide technical support; to install hardware and software upgrades; to prevent fraud; to respond to lawful service of process; to protect against unlawful use of our network; and to protect other network users.
3. If SageNet markets new communications-related products and services to existing customers, it provides telecommunications and VOIP customers with an opportunity to "opt out" of having its CPNI used for these purposes through an opt-out notification compliant with Section 64.2008 of the Commission's Rules. SageNet waits a minimum of thirty (30) days after providing customers with "opt-out" notification before assuming customer approval to use, disclose or permit access to CPNI. All CPNI opt-out elections are electronically stored.
4. SageNet does not have any marketing campaigns that use CPNI, however in such an event SageNet has adequate supervisory controls in place to ensure compliance with its CPNI policy.
5. SageNet does not share customer CPNI with any third parties for any purposes other than providing requested services to SageNet's customers or in response to a valid subpoena.
6. Each SageNet customer has a dedicated account representative and has/will receive a contract and/or service contract notification specifically addressing protection of CPNI.